

NET-METERING REGISTRATION GUIDANCE: AMENDMENTS AND FAQs

(See Rule 5.100, Rule Pertaining to Construction and Operation of Net-Metering Systems, Effective July 1, 2017)

AMENDMENTS TO REGISTRATIONS/NMR CPGs

An “amendment” to a net-metering registration (“registration”) or net-metering registration certificate of public good (“NMR CPG”) is a change to the *physical plans or design* of a net-metering system that is a roof-mounted solar facility of up to 500 kW in capacity, a ground-mounted solar facility of up to 15 kW in capacity, or a hydroelectric facility of up to 500 kW in capacity. Amendments may be “major” or “minor,” and depending on which they are, will trigger different requirements, discussed below. Changes to a registration/NMR CPG that are not major or minor amendments or transfers are “de minimis changes.”

If a previously approved NMR CPG expires before the project is ever built, the NMR CPG cannot be amended, changed, or transferred, and the applicant must file a new registration. Additionally, there is no need for the applicant to withdraw their prior NMR CPG.

“Major Amendment” to a registration/NMR CPG means:

- (a) increasing the system capacity (AC) of the net-metering system by more than 5% or reducing the system capacity (AC) of the net-metering system by more than 60%;
- (b) changing the fuel source of the net-metering system;
- (c) changing the utility with which the net-metering system will interconnect;
- (d) changing the address at which the net-metering system will be located; or
- (e) any other change that the Commission, in its discretion, determines is likely to have a significant impact under one or more of the criteria of Section 248 applicable to the net-metering system.

Major Amendments to All Registrations/NMR CPGs. If an applicant wishes to make a major amendment to a registration/NMR CPG, the applicant must file a new registration.

- **Pending Registrations.** The applicant should file a letter regarding the major amendment directly in the existing case in “All Other Documents.”
 - **For projects with a capacity of 15 kW or less**, the time clock must be re-set to 10 business days from the date the amendment was filed.
 - **For projects with a capacity of greater than 15 kW**, the time clock must be re-set to 30 days from the date the amendment was filed.
- **Previously Approved NMR CPGs, Already Built or Not Expired.** The applicant must file the new registration as a new case and reference the original CPG number. If the applicant is making a major amendment and needs additional time because the NMR CPG will expire soon, the applicant should withdraw the existing NMR CPG and file a new registration as a new case. The rates in place at the time the new registration is filed will apply.

“Minor Amendment” to a registration/NMR CPG means any change to the physical plans or design of the net-metering system that is not a major amendment. Minor amendments include any changes to the information in the “photovoltaic system information” or “hydroelectric system information” sections on the registration form, except for changes to the system capacity (AC) that qualify as major amendments.

- **Pending Registrations.** If an applicant wishes to make a minor amendment to a registration that has been filed but whose CPG has not been deemed issued, the applicant should file a letter regarding the minor amendment in the existing case in “All Other Documents.” The interconnecting utility has 10 business days from the date the minor amendment is filed to file comments or objections with the Commission.
 - **For projects with a capacity of 15 kW or less,** the time clock must be re-set to 10 business days from the date the amendment was filed.
 - **For projects with a capacity of greater than 15 kW,** the time clock must be re-set to 10 business days from the date the amendment was filed, if there are fewer than 10 business days remaining in the comment period. If there are more than 10 business days remaining in the comment period, no action is necessary.
- **Previously Approved NMR CPGs, Already Built or Not Expired.** If an NMR CPG has been previously approved and the CPG holder wishes to make a minor amendment, the CPG holder should file a new case as a “Petition Other,” which includes reference to the current CPG number and explains the minor amendment. The CPG holder may implement the proposed minor amendment without further action by the Commission, unless the utility files an objection within 10 business days from the date the minor amendment was filed.

“De Minimis Change” to a registration/NMR CPG means any change that is not a major or minor amendment or a transfer. De minimis changes include changes to: (1) if the registration is still pending, the applicant/customer name; (2) the applicant/customer’s mailing address, daytime phone, or email address; (3) the consumption meter number; (4) whether the system is a group net-metering system; (5) the address for the net-metering system made by the municipality for 911 purposes; (6) whether the applicant will lease or own the generation equipment; (7) the installer information; and (8) if the registration is still pending, the environmental attribute election.

If an applicant wishes to make a de minimis change to a registration/NMR CPG, the applicant should file a letter into the case for the registration/NMR CPG and the Clerk’s Office may make the change in ePUC without undertaking any additional process.

ANSWERS TO FREQUENTLY ASKED QUESTIONS

Transfers

- A person who acquires ownership of a property hosting a net-metering system must file a transfer form within 30 days of acquiring ownership.
- CPG holders seeking to transfer a net-metering CPG separately from a change in ownership of the property hosting the net-metering system must file a form to obtain Commission approval prior to transferring the CPG.
- Both transfer forms are available on the Commission's website.

Rates

- The rates in place at the time of original filing apply for 10 years from the date the CPG is deemed approved. After 10 years, the rate will depend on the applicable Commission rules.
- Net-metering incentives are currently the same for all system types, except for hydroelectric systems. In other words, a wind net-metering system receives the same incentives as a solar net-metering system, etc.

Installers

- An installer can add itself to a case to be notified by: (1) subscribing to the case, or (2) adding a person's name at the question, "Is the installer the same as the applicant?" The installer must enter the name of the person who wants to receive the emails, rather than just entering the name of the company.

Extensions of Time

- If a CPG holder is requesting an extension of its NMR CPG, but not concurrently requesting any other amendments or changes, the CPG holder should file a petition as a new case requesting the extension of time, explaining the reason for the requested extension, and referencing the current CPG number. The request must be filed before the CPG expires.

Environmental Attribute Election; Renewable Energy Credits (RECs)

- Changes to the environmental attribute election (i.e., who retains the RECs) are not allowed under Rule 5.100.
- If an NMR CPG has been approved and the CPG holder wishes to change the environmental attribute election (i.e., who retains the RECs), the person may file a letter requesting a waiver of the Commission's rules in order to change their environmental attribute election, along with the reason for the request. The letter should reference the current CPG number.
- Typically, the Commission has not allowed for CPG holders to change this election.

Projects that are Part Roof and Part Ground

- If a single project is part roof and part ground, the rules applicable to ground projects apply to the entire project.

Projects on Federal Land

- Projects that are proposed on federal land must comply with the same registration or application processes as all other projects.